

Exhibit 1

(CRD Complaint)

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Blake Lively

CRD No. 202412-27269003

Complainant,

vs.

Wayfarer Studios LLC

,

Justin Baldoni

,

Jamey Heath

,

Steve Sarowitz

,

Melissa Nathan

,

The Agency Group PR LLC

,

Jennifer Abel

,

RWA Communications LLC

,

Jed Wallace

,

Street Relations Inc.

,

Respondents

1. Respondent **Wayfarer Studios LLC** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **Justin Baldoni** individual as Co-Respondent(s).
Complainant is naming **Jamey Heath** individual as Co-Respondent(s).
Complainant is naming **Steve Sarowitz** individual as Co-Respondent(s).
Complainant is naming **Melissa Nathan** individual as Co-Respondent(s).
Complainant is naming **The Agency Group PR LLC** business as Co-Respondent(s).
Complainant is naming **Jennifer Abel** individual as Co-Respondent(s).
Complainant is naming **RWA Communications LLC** business as Co-Respondent(s).
Complainant is naming **Jed Wallace** individual as Co-Respondent(s).
Complainant is naming **Street Relations Inc.** business as Co-Respondent(s).

3. Complainant **Blake Lively**, resides in the City of , State of .

4. Complainant alleges that on or about **December 20, 2024**, respondent took the following adverse actions:

Complainant was harassed because of complainant's sex/gender, sexual harassment-hostile environment.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment and as a result was other adverse action(s).

Additional Complaint Details: Complainant Blake Lively alleges that Respondents Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, the Agency Group PR LLC, Jennifer Abel, RWA Communications LLC, Jed Wallace, and/or Street Relations Inc. engaged in a variety of conduct in violation of California Government Code section 12940 (the "FEHA") and Title VII of the Civil Rights Act of 1964 ("Title VII"). The conduct includes: sexual harassment; retaliation; failure to investigate, prevent, and/or remedy harassment; and aiding and abetting harassment and retaliation. Please see attached complaint for specific details.

1 VERIFICATION

2 I, **Esra Hudson**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On December 20, 2024, I declare under penalty of perjury under the laws of the State
6 of California that the foregoing is true and correct.

7 **Los Angeles, CA**
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